

IN THE CIRCUIT COURT OF COLE COUNTY
STATE OF MISSOURI

STATE OF MISSOURI ex rel.)	
Attorney General Eric Schmitt,)	
)	
Plaintiff,)	
)	Cause No.
v.)	
)	Div.
Blue Lotus Asian Massage Therapy)	
SERVE AT:)	
1801 Stadium Boulevard)	
Jefferson City, Missouri 65109;)	
)	
William Porter)	
SERVE AT:)	
2206 NW 56th Terrace)	
Kansas City, Missouri 64151;)	
)	
Teubner Properties LLC)	
SERVE AT:)	
1528 Fox Moor Court)	
Jefferson City, Missouri 64064.)	
)	
Defendants.)	

PETITION FOR INJUNCTION
OF A PUBLIC NUISANCE

Plaintiff State of Missouri, at the relation of Attorney General Eric S. Schmitt, brings this Petition for Preliminary Injunctions of a Public Nuisance, and upon information and belief, states as follows:

1. Illicit Massage Businesses (IMB) provide illegal sexual services to customers under the guise that they are a legitimate massage therapy business providing only legal and licensed massage therapy.

2. IMBs often serve as a front for human trafficking, illegal sex work, and forced labor.¹

3. The Polaris Project estimates that there are approximately 9,000 IMBs operating in the United States. Missouri is no exception. *See Exhibit 1.*

4. There are several indicators that a massage parlor is engaging in commercial sex and potential human trafficking. These include: prices significantly below market; customer reports of female masseuses who request large tips and who express disappointment if they do not receive a tip;; windows covered in a way that prevents passerbys from seeing inside the business; open late hours (i.e., until 9 p.m. or later); and advertising or customer reviews on commercial sex websites like RubMaps.ch, BackPage.com, and other illicit websites. *Id.* at 9.

5. Advertisements for IMBs may include a description of the masseuses' appearance or age, emphasizing their physical characteristics and young age. The advertisements typically include sexually-suggestive photos of Asian women that emphasize the women's appearance, not their massage therapy skills. *See id.*

6. In order to facilitate these illicit services, IMBs utilize websites that are solely used for the purposes of soliciting illicit behavior to advertise.

¹ See Nicholas Kulish, et al., "Behind Illicit Massage Parlors Lie Vast Crime Network and Modern Indentured Servitude," NEW YORK TIMES, March 3, 2019, available at: <https://www.nytimes.com/2019/03/02/us/massage-parlors-human-trafficking.html>.

See Order, *State of Missouri v. Golden Massage, et al.*, Case No. 1731-CC00950 (Greene County, Missouri, Aug. 20, 2020) (“The only purpose for which a massage business would advertise on BackPage.com CitXGuide.com, or Rubmaps.com [RubMaps.ch] is to attempt to promote prostitution service[s.]”).

7. Indeed, BackPage.com was seized by federal law enforcement in 2018 because it was the largest online marketplace for illegal sex trafficking..²

8. Backpage.com featured advertisements and customer reviews of illicit massage businesses.

9. CityXGuide.com was created one day after the FBI’s seizure of BackPage.com in order to fill the space created by the shutdown.³

10. In 2020, CityXGuide.com was also seized by federal law enforcement because it was “a leading source of online advertisements for prostitution and sex trafficking that users described as ‘taking over from where Backpage left off.’”⁴

11. After the shutdown of BackPage.com and CityXGuide.com, similar websites were created and proliferated, such as RubMaps.ch,

² see also Sarah N. Lynch, Lisa Lambert, *Sex ads website Backpage shut down by U.S. authorities*, REUTERS, April 6, 2018, available at: <https://www.reuters.com/article/us-usa-backpage-justice/sex-ads-website-backpage-shut-down-by-u-s-authorities-idUSKCN1HD2QP>.

³ See “U.S. Attorney’s Office Shuts Down Website [CityXGuide.com] Promoting Prostitution and Sex Trafficking, Indicts Owner,” U.S. Department of Justice, June 19, 2020, available at: <https://www.justice.gov/usao-ndtx/pr/us-attorney-s-office-shuts-down-website-promoting-prostitution-and-sex-trafficking#:~:text=June%2019%2C%202020-,U.S.%20Attorney's%20Office%20Shuts%20Down%20Website,and%20Sex%20Trafficking%2C%20Indicts%20Owner&text=Shortly%20after%20the%20defendant's%20arrest,Security%20pursuant%20to%20a%20warrant.>

⁴ *Id.*

AdultSearch.com, Eccie.net, and HarlotHub.com. These websites serve as platforms for IMBs to advertise their illicit services.⁵

12. Rubmaps.ch allows users to post reviews of massage parlors, including the type of sexual contact that has been allowed at the massage parlor. The website describes itself as a place “where fantasy meets reality,” and it requires an age of majority verification check before visitors can enter the full website.

13. The Attorney General is seeking injunctive relief preventing Blue Lotus Asian Massage Therapy, William Porter, and Teubner Properties LLC from engaging in conduct prohibited by § 567.080.

Parties

14. Eric S. Schmitt is the duly elected Attorney General of the State of Missouri and brings this action in his official capacity pursuant to Mo. Rev. Stat. Chapter 567.

15. Defendant Blue Lotus Asian Massage Therapy is registered to do business in the State of Missouri, and holds itself out as a massage therapy business with its principal place of business located at 1801 Stadium Boulevard, Jefferson City, Missouri 65109 .

⁵ See Dan Whitcomb “Exclusive: Report gives glimpse into murky world of U.S. prostitutionOctober 26th, 2020on in post-Backpage era,” REUTERS, available at: <https://www.reuters.com/article/us-usa-prostitution-internet-exclusive-idUSKCN1RN13E>.

16. Defendant William Porter is the owner of Blue Lotus Asian Massage Therapy and resides at 2206 NW 56th Terrace, Kansas City, Missouri 64151 in Jackson County, Missouri.

17. Defendant Teubner Properties LLC (“Landlord”) is the owner of the real property where Blue Lotus Asian Massage Therapy is located (the “Premises”).

18. Landlord is registered to do business within the State of Missouri, with a its principle place of business at 1528 Fox Moor Court, Jefferson City, Missouri 65109 in Cole County, Missouri.

Jurisdiction and Venue

19. This Court has subject matter and personal jurisdiction over this action under Art. V, § 14 Mo. Const. and Mo. Rev. Stat. § 506.500.

20. Venue is proper in this Court pursuant to Mo. Rev. Stat. § 508.010.2, in that venue lies in any county in which a Defendant resides or can be found.

21. Venue is proper because the Premises, which is the subject matter of this lawsuit, is located within Cole County.

Statutory Authority

22. Mo. Rev. Stat. §567.080 declares the regular use of a room, building, or structure for prostitution activity to be a public nuisance, and allows the Attorney General to prosecute a suit to enjoin the nuisance. The

Attorney General may include owners, lessees, officers, agents, or employees in the action.

Allegations of Fact

23. For years, massage parlors located throughout the State of Missouri have been conducting public nuisances by “providing sexual contact for pay and/or unlawful prostitution activity” on business premises. Blue Lotus Asian Massage Therapy is one such illicit massage parlor.

24. Blue Lotus Asian Massage Therapy advertises its services on RubMaps.ch, AdultSearch.com, and Eccie.net.

25. The advertisements and reviews for Blue Lotus Asian Massage Therapy on these sites contained the following graphic and/or suggestive content:

- a. An advertisement for Blue Lotus Asian Massage Therapy was posted on RubMaps.ch under the category “erotic massage.” **Exhibit 2.** The advertisement states it is open until 10:00 p.m. Monday through Saturday. *Id.* The advertisement includes Blue Lotus Asian Massage Therapy’s phone number and address, as well as a photo of the outside of the massage parlor. *Id.* RubMaps is a website that advertises itself as “where fantasy meets reality.” *Id.* On the RubMaps.com website, there is a banner ad which

includes a photo of a woman in lingerie and forum posts advertising “Lot of 152 New Asian Porn DVDs for Sale” *Id.* Across the top, RubMaps suggests searches such as “Erotic massage Jefferson City, Asian massage Jefferson City.” *Id.* The RubMaps advertisements includes fourteen reviews of services provided by “YaYa”, “Grace”, and “Angela”. *Id.*

i. One Review from May 2020, states “I grab her butt and she lets me. Keeps rubbing my back for about 20minutes [*sic*], She teases my asshole and balls from behind, I flip. She then says for \$50 more she’ll give me a HJ [“hand job”]...I told her to remove her top and she agreed. She takes off her top. [. . .] Finishing me off and sending me on my way. Worth it, I would recommend.” **Exhibit 3.**

ii. Another review from April, 28 2020 indicates the services included “Breast-Play” and “Handjob.” The review states in further detail: “When [the masseuse] stood at the head of the table, I reached out with both arms and grabbed her ass. Felt her up again and again all throughout. She was enjoying every bit of it. [. . .] Still she let me feel her ass and play with her tits

(OTC) Tug was performed with both hands and some ball rubbing. Best HJ I've received as of yet." **Exhibit 4.**

- iii. Another review posted in April 2020 of an experience in August 2019 states "[The Masseuse's] HJ technique was just as good [*sic*] as the rest of my massage."

Exhibit 5.

- b. An advertisement for Blue Lotus Asian Massage Therapy is posted on AdultSearch.com, an escort website. *See* **Exhibit 6.** The advertisement includes Blue Lotus Asian Massage Therapy's address and phone number, as well as a photo of the exterior of the massage parlor. *Id.* This advertisement also includes a reference to the massage parlor being open until 10:00 p.m. p.m. *Id.* Blue Lotus Asian Massage Therapy is advertised on AdultSearch.com under "Home > USA > MO > Jefferson City > Erotic Massage Parlors." *Id.* AdultSearch.com includes descriptors such as "Jefferson City Shemale Escorts" and "Gay Escorts" as well as links to "Live Sex Cams." *Id.* AdultSearch.com also includes a linked button for "M4M [male looking for male] Escorts," "Erotic Massage," and "Sex Forums." *Id.*

- c. Defendant Blue Lotus Asian Massage Therapy is discussed on Eccie.net, an escort website. *See Exhibit 7* (referring to Blue Lotus's telephone number under, "Sacred Lilly of the Nile"). Eccie.net's tagline is, "will she do what your wife won't." *Id.* Eccie includes at least fifteen photos of women in various forms of undress. *Id.* Eccie.net allows users to start "Threads" on massage parlors to share their experiences. *Id.*
 - i. One "Thread" was started by a user named "HardHitter88" on July 21, 2018. *Id.* This post includes Blue Lotus Massage's address and phone number. *Id.* The user states that he received FBSM +, indicating he received a "Full Body Sensual Massage" and more. *Id.* He describes the masseuse as "Taller and thicker than most asians, yoga pants" and recommends this massage parlor for other users to attend in order to receive sexual services. *Id.*

26. Upon information and belief, the activities described in the above above advertisements and reviews occurred at Blue Lotus Massage, and they qualify as illegal prostitution activities under Missouri law.

27. Since 2018 Blue Lotus Asian Massage Therapy has been conducting business from the Premises located at 1801 Stadium Boulevard,

pursuant to a lease agreement between Landlord and Blue Lotus Asian Massage Therapy.

28. On September 4th, 2020, the Attorney General's Office notified Landlord via letter regarding the highly suspicious nature of Blue Lotus Asian Massage Therapy's advertising for services offered at the Premises. The Attorney General's Office informed Landlord that the Premises was being advertised as available for prostitution activity. The letter requested Landlord to take action to abate the public nuisance created by such prostitution activity.

29. On October 26th, 2020, the Attorney General's Office notified Landlord via certified mail letter a second time.

30. Upon information and belief, Landlord failed to respond to the Attorney General's Office and failed take action to abate the public nuisance occurring at the Premises.

31. Blue Lotus Asian Massage Therapy is registered with the State of Missouri, with its owner listed as William Porter. William Porter is aware of the prostitution activities taking place at Blue Lotus Asian Massage Therapy. On information and belief, William Porter knowingly profits from the prostitution activities.

32. Upon information and belief, since approximately 2018 the Premises occupied by Blue Lotus Asian Massage Therapy has been regularly used for prostitution activities.

Count I – Operating a Public Nuisance
(Against All Defendants)

33. Plaintiff incorporates all of the allegations contained in Paragraphs 1 through 32 above.

34. Blue Lotus Asian Massage Therapy, utilizes the Premises located at 1801 Stadium Boulevard, in Cole, County Missouri, as a massage parlor in which employees of Blue Lotus Asian Massage Therapy carry out sexual conduct on customers of Blue Lotus Asian Massage Therapy in exchange for money or other items of value.

35. As such, the Premises, which are occupied by Blue Lotus Asian Massage Therapy, is regularly used for prostitution activity prohibited under § 567.080, RSMo.

36. As such, the Premises occupied by Blue Lotus Asian Massage Therapy constitutes a public nuisance under § 567.080.

37. Defendants William Porter and Teubner Properties LLC aided and/or facilitated the public nuisance.

WHEREFORE, Plaintiff State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment in favor of

Petition enjoining the nuisance, and such further relief as this Court deems just and proper.

Count II – Operating a Public Nuisance under §567.080.3
(Against William Porter)

38. Plaintiff incorporates all of the allegations contained in Paragraphs 1 through 37 above.

39. The Premises, which are occupied by Blue Lotus Asian Massage Therapy, is a public nuisance because it is regularly used for prostitution activity prohibited by chapter 567.080, RSMo.

40. William Porter, is the owner, officer, agent, or employee of Blue Lotus Asian Massage Therapy.

41. William Porter aided and/or facilitated the public nuisance occurring on the Premises by advertising on the following illicit websites: RubMaps.ch, AdultSearch.com, and Eccie.net.

WHEREFORE, Plaintiff State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment enjoining William Porter from engaging in, aiding in, or promoting any prostitution activity anywhere within this Court's jurisdiction, and such further relief as this Court deems just and proper.

COUNT III – Operating A Public Nuisance
under §567.080.2 and § 567.080.3
(Against Landlord)

42. Plaintiff incorporates all of the allegations contained in Paragraphs 1 through 41 above.

43. The Premises, which are occupied by Blue Lotus Asian Massage Therapy, are regularly used for prostitution activity.

44. Landlord owns the Premises, upon which Blue Lotus Asian Massage Therapy is operating a public nuisance.

45. As of September 4th, 2020 Landlord knew or had reason to believe that the Premises was being being used regularly for prostitution activity.

46. As such, the Premises is a public nuisance.

47. Landlord, as an owner, officer, agent, or employee of the premises where Blue Lotus Asian Massage Therapy is located, aided and facilitated the public nuisance on the Premises.

WHEREFORE, Plaintiff State of Missouri ex rel. Attorney General Eric S. Schmitt respectfully requests that the Court enter judgment enjoining Landord from allowing the premises to be use for prostitution activities, order that the premises shall not be occupied for one year, and such other relief as this court deems just and proper.

Respectfully submitted,
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